U.S. Department of Justice

United States Attorney
Eastern District of New York

MKM:NEM/MCM/AK
F. #2015R00888

271 Cadman Plaza East
Brooklyn, New York 11201

May 27, 2016

By Hand and ECF

The Honorable Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Qian Zheng, et al.
Criminal Docket No. 15-628 (S-1) (CBA)

Dear Judge Amon:

The government respectfully writes to advise the Court that on May 26, 2016, a grand jury sitting in this district returned a superseding indictment in the above-captioned case.

In addition to the removal of the defendants Allen Hui Chen and Billy Chen, who have pleaded guilty, the superseding indictment includes the following changes:

1. Defendant Jiyao Jiang is no longer listed as a member or associate of the Zheng Organization in paragraph 2.

2. Defendants Xin Lin and Xue Jiang Gao have been added to the defendants charged in Count One.[1]

3. Racketeering Act One-A has been added. It names Qian Zheng and Jiang Gao in a Ketamine distribution conspiracy.

4. Jiang Gao has been added as a defendant named in Racketeering Act One-B, which charges ketamine distribution.

---

[1] References to Counts, Racketeering Acts and victims herein are reflective of how they appear in the superseding indictment.

5. Racketeering Act Two, which alleges Lin’s involvement in the extortion conspiracy and attempted extortion of Jane Doe 1 in Brooklyn, New York on May 3, 2013, has been added.

6. Lin and Jiang Gao have been named in Racketeering Act Five, charging extortion conspiracy and attempted extortion of John Doe 2. They had previously been charged with the substantive counts charging this same extortion conspiracy and attempted extortion in the underlying indictment. The corresponding substantive counts are now Counts Ten and Eleven.

7. Count Two, charging Zheng and Jiang Gao with ketamine distribution conspiracy, has been added.

8. Jiang Gao and Guifu Gao have named in Count Three, which charges ketamine distribution.

9. Counts Six and Seven, charging extortion conspiracy and attempted extortion as substantive offenses mirroring the federal charges in Racketeering Act Two, have been added.

10. Count Seventeen, charging Zheng with unlawful procurement of naturalization, has been added.

The government has produced a small amount of additional Rule 16 material arising from the changes in the superseding indictment today. Additional information relevant to the changes will be forthcoming in the government’s 18 U.S.C. § 3500 productions.

The government respectfully requests that the defendants be arraigned on the superseding indictment at the next scheduled Court appearance, or on any earlier date convenient for the Court.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: ____________________________
Nadia E. Moore
Maria Cruz Melendez
Ameet Kabrawala
Assistant U.S. Attorneys
(718) 254-6362/6408/6001